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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD JAGGARD and JUDY
JAGGARD,

Plaintiffs,

vs.

ABBOTT LABORATORIES, an entity of
unknown corporate form; and DOES 1 through
50, INCLUSIVE,

Defendants.

CASE NO. 3:21-cv-00360-RCJ-CLB

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

(First Request)

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Defendant ABBOTT LABORATORIES (“Defendant”) and Plaintiffs RICHARD JAGGARD and JUDY JAGGARD (“Plaintiffs”) (collectively, the “Parties”) by and through their respective attorneys of record, hereby jointly stipulate as stated below.

STIPULATION

1. On March 15, 2021, Plaintiffs initiated the underlying action in the Second Judicial District Court situated in Washoe County, Nevada.

2. On July 12, 2021, Plaintiffs served Defendant with the summons and complaint. *See* ECF No. 1-1.

3. On August 10, 2021, Defendant filed a Petition for Removal to the United States District Court, District of Nevada. ECF No. 1.

4. Counsel for Defendant informed counsel for Plaintiffs that it does not appear that Abbott Laboratories is the proper defendant-entity in this case, that Abbott Vascular, Inc. may be the proper entity, and that the parties would need additional time to confirm which entity should be responding to the Complaint, and to further discuss and agree upon the procedural means for correcting the pleadings, as needed.

Accordingly, given that this is the first request to extend the time to respond, and pursuant to local rule IA 6-1, Defendant respectfully requests that the court grant this motion, and extend Defendant's deadline to file an answer or other responsive pleading until September 8, 2021. Plaintiff does not object to the requested extension.

Dated this 16th day of August, 2021.

GORDON REES SCULLY
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/s/ Dione C. Wrenn
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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED:  August 18, 2021